

# **EXHIBIT B**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

<p>SECURITIES INVESTOR PROTECTION CORPORATION,</p> <p>Plaintiff-Applicant,</p> <p>v.</p> <p>BERNARD L. MADOFF INVESTMENT SECURITIES LLC,</p> <p>Defendant.</p>	<p>Adv. Pro. No. 08-01789 (SMB)</p> <p>SIPA Liquidation</p> <p>(Substantively Consolidated)</p>
<p>In re:</p> <p>BERNARD L. MADOFF,</p> <p>Debtor.</p>	
<p>IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>UBS AG, UBS (LUXEMBOURG) SA, UBS FUND SERVICES (LUXEMBOURG) SA, UBS THIRD PARTY MANAGEMENT COMPANY SA, ACCESS INTERNATIONAL ADVISORS LLC, ACCESS INTERNATIONAL ADVISORS LTD., ACCESS MANAGEMENT LUXEMBOURG SA (f/k/a ACCESS INTERNATIONAL ADVISORS (LUXEMBOURG) SA) as represented by its Liquidator MAÎTRE FERNAND ENTRINGER, ACCESS PARTNERS SA as represented by its Liquidator MAÎTRE FERNAND ENTRINGER, PATRICK LITTAYE, CLAUDINE MAGON DE LA VILLEHUCHET (a/k/a CLAUDINE DE LA VILLEHUCHET) in her capacity as Executrix under the Will of THIERRY MAGON DE LA VILLEHUCHET (a/k/a RENE THIERRY DE LA VILLEHUCHET), CLAUDINE MAGON DE LA VILLEHUCHET (a/k/a CLAUDINE DE LA VILLEHUCHET) individually as the sole beneficiary under the Will of THIERRY MAGON DE LA VILLEHUCHET (a/k/a RENE THIERRY</p>	<p>Adv. Pro. No. 10-04285 (SMB)</p>

DE LA VILLEHUCHET), PIERRE  
DELANDMETER, THEODORE DUMBAULD,  
LUXALPHA SICAV as represented by its  
Liquidators MAÎTRE ALAIN RUKAVINA and  
PAUL LAPLUME, MAÎTRE ALAIN RUKAVINA  
AND PAUL LAPLUME, in their capacities as  
liquidators and representatives of LUXALPHA  
SICAV, and GROUPEMENT FINANCIER LTD.,  
  
Defendants.

**[PROPOSED] ORDER GRANTING THE TRUSTEE’S MOTION FOR LEAVE TO  
FILE A SECOND AMENDED COMPLAINT**

**THIS MATTER**, having come before the Court on Plaintiff’s Motion for Leave to File a Second Amended Complaint (the “Motion”), and the Court having considered the submissions in support of and in opposition to the Motion, and the Court having found good cause for the relief sought in the Motion, it is hereby

**ORDERED** that the Motion is granted. The Trustee is granted leave to file his Second Amended Complaint in substantially the form attached to the Motion within thirty (30) days after entry of this order.

Dated: \_\_\_\_\_, 2020  
New York, New York.

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE